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April 15, 2021

By ECF

The Honorable Kimba M. Wood
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 100075

MEMO ENDORSED

Re: United States v. Joseph Asan
20 Cr. 86 (KMW)

Dear Judge Wood:

On December 23, 2020, Mr. Asan appeared before the Honorable Barbara C. Moses and pled guilty to Count One of the above-referenced Indictment charging him with conspiring with others to commit bank and wire fraud. Sentencing is scheduled for April 21, 2021 at 11:00 a.m. For reasons primarily related to the ongoing COVID-19 pandemic, the defense writes now to respectfully request that sentencing be adjourned for 45-days.

Given the current health crisis and defense counsel's workload, it has been uniquely difficult to meaningfully consult with Mr. Asan (who resides in Florida), locate and gather critical sentencing information for the Court, and have adequate time to effectively prepare for sentence. It is for these reasons that I respectfully request additional time to prepare for Mr. Asan's sentencing.

A.U.S.A. Sagar Ravi consents to this adjournment request on behalf of the government.

Thank you.

Respectfully,

/s/ Matthew J. Kluger
Matthew J. Kluger, Esq.

cc: AUSA Sagar K. Ravi

SO ORDERED: N.Y., N.Y.

Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.

Sentencing is adjourned to July 8, 2021, at 11:00 a.m. Defendant's submission is due by June 24. Government submission is due by July 1.